

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SHANE GUAY,

Defendant.

19-CR-103-JLS-HKS

NOTICE OF MOTION

MOTION BY:

Jeffrey T. Bagley, Assistant Federal Public Defender.

DATE, TIME & PLACE:

Before the Honorable John L. Sinatra, Jr., United States District Judge, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York, **on the papers submitted.**

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public Defender Jeffrey T. Bagley, dated March 18, 2021.

RELIEF REQUESTED:

A 45-day adjournment of the Sentencing date and Scheduling Order.

DATED:

Buffalo, New York, March 18, 2021.

Respectfully submitted,

/s/Jeffrey T. Bagley

Jeffrey T. Bagley
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Counsel for Defendant Shane Guay

TO: Meghan Tokash
Assistant United States Attorney

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

19-CR-103-JLS-HKS

v.

AFFIRMATION

SHANE GUAY,

Defendant.

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and was assigned to represent the above-named defendant, Shane Guay.
2. Sentencing is currently scheduled before Your Honor on April 1, 2021.
3. I respectfully request a 45-day adjournment of the Sentencing date so that I can better prepare for sentencing. I have not been able to meet with Mr. Guay at the jail since his detention, and I would like to do so before sentencing.
4. Assistant United States Attorney Meghan Tokash has no objections to this adjournment.

WHEREFORE, it is respectfully requested that the Court grant Mr. Guay's motion for a 45-day adjournment of the Sentencing date, currently set for April 1, 2021, and Scheduling Order.

DATED: Buffalo, New York, March 18, 2021.

Respectfully submitted,

/s/Jeffrey T. Bagley

Jeffrey T. Bagley

Assistant Federal Public Defender

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Counsel for Defendant Shane Guay

TO: Meghan Tokash
Assistant United States Attorney